



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 20, 2021

MEMORANDUM TO: Philip J. McKenna, Chief  
Vogtle Project Office  
Office of Nuclear Reactor Regulation

FROM: Cayetano Santos Jr., Sr Project Manager  
Vogtle Project Office  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR  
OPERATING COMPANY ON JUNE 24, 2021

*Cayetano Santos Jr.*

Signed by Santos, Cayetano  
on 07/20/21

The U.S. Nuclear Regulatory Commission (NRC) staff held a public observation meeting with Southern Nuclear Operating Company (SNC) on June 24, 2021. The purpose of the meeting was to discuss (1) a draft request for an exemption from operator written examination and operating test requirements for Vogtle Electric Generating Plant (VEGP) Unit 4 and (2) draft inspections, tests, analyses, and acceptance criteria (ITAAC) closure notification for ITAAC index number 515.

The meeting notice can be found in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML21174A077. The meeting notice was also posted on the NRC public website. Enclosures 1 and 2 are the meeting agenda and attendance list for the meeting, respectively. The documents referenced during the discussion can be found at the ADAMS Accession Nos. given below:

DRAFT Request for Exemption from Operator Written Examination and Operating Test for Unit 4 Licenses	ML21166A117
NRC Staff Talking Points on SNC Vogtle Unit 4 Draft Exemption Request	ML21173A225
SNC Presentation - Exemption from Operator Written Examination and Operating Test for Unit 4 Licenses	ML21193A077
Draft ITAAC Closure Notification for ITAAC Index Number 515	ML21174A047

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### Meeting Summary

On June 24, 2021, the NRC staff held an observation public meeting with Southern Nuclear Operating Company (SNC) to discuss two topics.

#### Topic 1:

The first topic was a pre-submittal discussion of a draft request for an exemption from the requirements in Title 10 of the Code of Federal Regulations (10 CFR) 55.33(a)(2) and 10 CFR 55.31(a)(3) regarding written examination and operating tests. SNC plans to request that the previous written examinations and operating tests taken by VEGP Unit 3 licensed operators be applied to the initial application for operator licenses for VEGP Unit 4 on the basis that the units are both AP1000 plants and are essentially identical. SNC staff described their draft exemption request (ADAMS Accession Nos. ML21166A117 and ML21193A077). After reviewing the draft exemption request, the NRC staff prepared several talking points and questions (ADAMS Accession No. ML21173A225).

Below are SNC's responses and the resulting discussion for each of the staff's talking points:

1. SNC intends to include all Unit 3 reactor operator license holders and applicants within the scope of this exemption request. Enclosure 2 of the request will list the names of all the affected individuals.
2. Fourteen applicants have passed the NRC's initial licensing examination and have requested a license for Unit 3. SNC intends to submit the exemption request prior to these individuals receiving their Unit 3 license. NRC staff stated that SNC does not need to wait until the Unit 3 licenses have been issued before submitting the exemption request. However, SNC will need to ensure that license applications (i.e., NRC Form 398) that include a request for an operator's license at Unit 4 have been submitted to the NRC region for all of the individuals within the scope of the exemption request.
3. Isolating the main unit generators from the switchyards at Units 3 and 4 use the same actions, same procedures, and occur in the same amount of time. There are differences in the equipment nomenclature, which are reflected on the display screens at the two units. SNC will include a more detailed description of these similarities and differences in its exemption request. SNC staff stated that electrical distribution diagrams contain proprietary information and can be provided to staff, if requested. The NRC staff stated that this information does not need to be submitted on the docket at this time. If needed, the staff would perform a regulatory audit to review these diagrams.
4. The Master Equipment List is a database maintained by SNC that lists equipment and components for both Units 3 and 4.
5. "Functionally identical" means that each of the structures, systems and components in each unit perform their design functions under identical conditions.
6. In this context "additional" means in addition to training that has already been provided and included in the training program.
7. SNC clarified that the licensed operator continuing training program is the requalification program that is based on 10 CFR Part 55 requirements, and it is accredited through the National Academy for Nuclear Training. SNC will clarify this point in the exemption request.
8. SNC understands the staff's comment and will clarify how granting the exemption serves the public interest by using the NRC's Principles of Good Regulation (i.e., independence, openness, efficiency, clarity, and reliability), specifically addressing efficiency.

SNC plans to submit the exemption by June 30, 2021, and request that NRC complete its review by November 30, 2021.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Topic 2:

The second topic was a discussion of the draft ITAAC closure notification (ICN) for ITAAC index number 515. This ITAAC verifies that certain sensors that are used for input to the Diverse Actuation System (DAS) are separate from those used by the Protection and Safety Monitoring System (PMS) and plant control system. The uncompleted ITAAC notification (UIN) for ITAAC index number 515 was submitted on April 16, 2019 (ADAMS Accession No. ML19106A221). SNC described a change between this UIN and the ICN it plans to submit (ADAMS Accession No. ML21174A047).

NRC staff provided the following comments:

- SNC staff stated that the DAS Core Exit Temperature sensors listed as part of ITAAC index number 515 cannot be installed until after fuel load since the thimble assemblies use the fuel bundles to support them and without support could be damaged.
- NRC staff's understanding at the time it reviewed the UIN was that the sensors would be installed and inspected in their as-built configuration and location when the ICN was submitted.
- NRC staff asked how the acceptance criteria could be met if the sensors are not already installed. SNC staff responded that Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for ITAAC Closure Process Under 10 CFR Part 52," allows for inspections, tests, and analyses designated in the ITAAC to be completed "as-built" to be done at other than its final installed location when technically justifiable. Drawings and construction work packages were used to confirm that signals from the thimble assemblies do not interface with the PMS or plant control system. NRC staff noted that NEI 08-01 also states that for "as-built" ITAAC the ICN should not be submitted until after the component is installed in its final location.
- NRC staff will consider SNC's comments including those that the sensors and thimble assemblies could be damaged if installed before fuel load and will continue discussions with SNC on ITAAC index number 515 during a future public meeting.
- NRC staff noted that there are other impacted ITAAC that could be subject to similar proposed changes. SNC staff agreed and stated that they have already identified three or four such ITAAC. SNC would be prepared to discuss these other ITAAC with the NRC at a future public meeting.

At the conclusion of the discussion, there was an opportunity for the public to provide comments and ask questions. There were no comments or questions from the public.

Docket No.: 52-025  
52-026

Enclosures:  
As stated

cc w/encls: See next page

SUBJECT: SUMMARY OF A PUBLIC MEETING WITH SOUTHERN NUCLEAR OPERATING COMPANY ON JUNE 24, 2021 DATED: JULY 20, 2021

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**ADAMS Accession No.: ML21194A040**

**\*via e-mail**

**NRR-106**

<b>OFFICE</b>	PM: NRR/VPO	LA: NRR/VPO	BC: NRR/DRO/IOLB	BC: RII/DRS/OB2
<b>NAME</b>	CSantos	RButler	CCowdrey	EGuthrie
<b>DATE</b>	7/12/2021	7/13/2021	7/13/2021	7/20/2021
<b>OFFICE</b>	BC: NRR/VPO	PM: NRR/VPO		
<b>NAME</b>	PMcKenna	CSantos		
<b>DATE</b>	7/20/2021	7/20/2021		

**OFFICIAL RECORD COPY**



**PUBLIC MEETING**  
**U.S. NUCLEAR REGULATORY COMMISSION**  
**Thursday, June 24, 2021**  
**List of Attendees**

Name	Organization
Cayetano (Tanny) Santos Christopher Welch Philip McKenna James Gaslevic William (Billy) Gleaves Greg Bowman Lauren Nist Michael Webb Brandon Hartle Jennie Rankin Christian Cowdrey Chandu Patel	NRC/Office of Nuclear Reactor Regulation
Eugene Guthrie David Lanyi Bruno Caballero	NRC/Region II
Michael Spencer	NRC/Office of the General Counsel
Steven Leighty Jason Weathersby Rob Stough Dennis Spielman Tom Ryan Kelli Anne Roberts Bob Beilke Calvin Morrow Tim Cureton Nathan Chapman	Southern Nuclear Operating Company
None identified	Members of the Public

Note: All participated via teleconference.